Customer Complaint Handling & Grievance Redressal Policy

Applicable to all clients serviced by Gera Wealth Pvt Ltd (ARN 147697)

1. Objective

This policy sets out the process, timelines, and escalation matrix through which Gera Wealth Pvt Ltd ("the Firm") receives, records, and resolves complaints from clients, and the manner in which the Firm assists both investors and Asset Management Companies (AMCs) in grievance redressal.

2. Channels for Lodging a Complaint

- Email to the designated grievance email ID
- Phone / WhatsApp to the client's Relationship Manager
- In person, at our Noida office
- In writing, addressed to the Principal Officer

3. Complaint Handling Process & Timelines

Stage	Action	Turnaround Time (TAT)
Acknowledgement	Complaint is logged in the central Complaint Register and acknowledged to the client	Within 1 working day
Level 1 Resolution	Relationship Manager / designated contact person reviews and resolves routine complaints	Within 5 working days
Level 2 Resolution	Grievance / Compliance Officer takes up complaints not resolved at Level 1, or complex/sensitive matters	Within a further 7 working days
Level 3 Resolution	Principal Officer / Director reviews and closes any complaint still unresolved	Within a further 5 working days
Outer limit	All complaints are targeted for closure well within SEBI's SCORES 2.0 ATR timeline	21 calendar days (SEBI outer limit)

4. Internal Escalation Matrix

Level	Escalation Point	Contact
Level 1	Relationship Managers	Rahul – 7503020114 Dheeraj – 8799741004 support@gwc.co.in
Level 2	Grievance / Compliance Officer	Pankaj Kumar Gera – 9891250443 pankaj@gwc.co.in
Level 3	Director (Principal Officer)	Anju Gera – 7503020117 anju@gwc.co.in

If the client remains unsatisfied after Level 3 review, the following external avenues are available:

- The concerned **AMC's** Investor Service Centre / Compliance Officer, especially where the matter relates to a specific scheme or transaction
- **AMFI**, citing the Firm's ARN (147697), under AMFI's grievance mechanism against distributors
- **SEBI SCORES** (scores.sebi.gov.in) – complaints are auto-routed to the Firm, which must submit an Action Taken Report (ATR) within 21 calendar days; if the client is not satisfied with the ATR, a first-level review (15 days) and a second-level SEBI review are available, followed by referral to the **SMART Online Dispute Resolution (ODR)** portal for conciliation/arbitration

5. Disclosure to Clients

This policy, along with the escalation matrix and contact details above, is disclosed to clients through: (i) a dedicated Investor Grievance section on the Firm's website, which also links to the SEBI SCORES portal and AMFI's distributor complaint page; (ii) the client onboarding/welcome communication; and (iii) on request at any time during the client relationship.

6. Assistance to Investors and AMCs

To investors: the Firm helps identify the appropriate redressal channel, assists in drafting and submitting complaints to the relevant AMC/RTA, and follows up on the client's behalf until closure.
To AMCs: the Firm cooperates fully during an AMC's grievance/ATR process by promptly furnishing transaction records, KYC documentation, and client communication logs, and by coordinating directly with the AMC's compliance/RTA teams to enable timely resolution within SEBI's prescribed timelines.

7. Record-Keeping & Review

All complaints are logged in a central Complaint Register with root-cause classification. Senior management reviews the register periodically to identify recurring issues, track TAT adherence, and strengthen the process where required.

8. Classification: Service Request vs. Complaint

Not every client communication is a complaint. A clear distinction is maintained between a routine **Service Request** – where the client is simply seeking information, a document, or a transaction – and a **Complaint** – where the client is expressing dissatisfaction about a deficiency in service or conduct. Service Requests are logged in a separate Service Request Register with their own TAT, and are **not** counted as complaints.

Re-classification rule: a Service Request that remains unfulfilled beyond its defined TAT, and where the client expresses dissatisfaction about the delay, is re-classified and logged as a Complaint, and the escalation matrix above applies from that point.

Service Requests (Not a Complaint)	Complaints
• Request for Statement of Account (SOA) / Transaction Statement • Request for Capital Gains / Loss Statement • Request for Consolidated Account Statement (CAS) • Change of address, email ID, mobile number or bank mandate • Updating / adding nomination • Folio consolidation or merger request • Duplicate statement, certificate or account-closure letter • General queries on NAV, scheme performance or product features	• Non-receipt of SOA / CAS / Capital Gains Statement despite a specific request and lapse of TAT • Incorrect figures in SOA / Capital Gains Statement • Delay or non-execution of purchase, redemption, switch, SIP / STP / SWP instruction • Wrong NAV applied or incorrect units allotted • Unauthorised transaction executed without client consent • Delay in credit of redemption / dividend proceeds • Mis-selling, or non-disclosure of risk, exit load or commission • Rude behaviour or non-responsiveness by staff • Breach of client data confidentiality

9. Sample Documentation

For illustration, the formats below (with sample entries) show how Service Requests and Complaints are logged and tracked in practice.

(a) Service Request Register – Sample Entry

SR No.	Date	Client / Folio	Nature of Request	Channel	Assigned To	TAT	Closed On	Status
SR-0142	05-Aug-26	A. Kumar / 123456	Capital Gains Statement, FY25-26	Email	Rahul	3 working days	07-Aug-26	Closed

(b) Complaint Register – Sample Entry

Cmpt. No.	Received	Client / Folio	Category	Level Assigned	TAT	Resolved On	Root Cause	Status
CMP-0031	10-Aug-26	B. Sharma / 654321	Delay in redemption credit	Level 1 – Rahul	5 working days	14-Aug-26	RTA processing delay	Resolved

(c) Sample Complaint Acknowledgement – Text Template

Dear [Client Name],

This is to acknowledge receipt of your complaint dated [Date] regarding [brief nature of complaint], logged under reference no. [CMP-XXXX].

We are reviewing the matter and will revert with a resolution within [X] working days, in line with our Grievance Redressal Policy. Should you need any clarification in the interim, please reach out to [Level 1 contact].

Regards,
Gera Wealth Pvt Ltd

This policy is reviewed periodically and may be updated to reflect changes in SEBI/AMFI regulations. Gera Wealth Pvt Ltd | AMFI Registered Mutual Fund Distributor | ARN – 147697